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Attorney for Jerome Michael Bell

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JEROME MICHAEL BELL,

Defendant.

Case No. 2:15-cr-00011-JCM-CWH

**Stipulation and Order to Extend
Deadline to Supplement Compassionate
Release (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by Jacqueline Tirinnanzi, counsel for Jerome Michael Bell, and Jim Fang, counsel for the United States of America, that the deadline on which defendant must file his supplement in support of compassionate release is extended 45 days from the day of this filing, to on or before July 4, 2024.

This stipulation is entered into based upon the following reasons:

1. Counsel for Defendant was appointed to Mr. Bell to supplement his motion for compassionate release on December 28, 2023. (ECF No. 250).
2. According to Amended General Order 2020-06 In Re: Compassionate Release Requests Under the First Step Act, the FPD must file a supplement to the defendant's pro se motion within thirty days.
3. At this time, Mr. Bell requires an additional 45 days to supplement his pro se motion for compassionate release for the following reasons.

- 1 4. At the time of Ms. Tirinnanzi's CJA appointment to supplement Mr. Bell's motion,
2 he was in custody on a writ at the Clark County Detention Center ("CCDC"). On
3 February 2, 2024, when defense counsel was approved for communication and
4 visitation with Mr. Bell at CCDC, she was made aware that Mr. Bell was no longer
5 at the facility.
- 6 5. Due to Mr. Bell's transport from CCDC back to Beaumont USP, communication
7 with Mr. Bell and defense counsel was delayed until February 23, 2024.
- 8 6. Initially Mr. Bell was unresponsive to follow up written attorney-client
9 communication. An additional attempt was made, and according to USPS tracking
10 services, on April 12, 2024, Beaumont USP rejected attorney mail sent to Mr. Bell.
11 It is necessary for Mr. Bell to receive the mail for purposes of moving forward with
12 his supplement to motion for compassionate release.
- 13 7. Defense counsel received a second call with Mr. Bell on May 13, 2024
14 (communication is challenging due to frequent lockdowns). Counsel was made
15 aware that Mr. Bell did not receive his attorney mail and therefore Mr. Bell has not
16 filled out documentation necessary for defense counsel to move forward with
17 supplementation of his motion for compassionate release.
- 18 8. Counsel for Mr. Bell is in the process of mailing and obtaining documentation
19 relating to the client's matter and investigating the relevant information necessary to
20 support the supplement.
- 21 9. Further communication with the client who is detained, is also required to complete
22 Mr. Bell's supplement to motion for compassionate release. Obtaining
23 communication with penitentiary inmates is difficult due to institutional security and
24 frequent lockdowns.
- 25 10. The parties agree to the extension of time for 45 days.
- 26 11. This is the first request for extension of time.
- 27
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3 Dated this 20th day of May 2024.
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5 Respectfully Submitted,
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7 /s/ Jim Fang
8 JIM FANG, ESQ.
9 Assistant United States Attorney

10 /s/ Jacqueline Tirinnanzi
11 JACQUELINE TIRINNANZI, ESQ.
12 Counsel for Jerome Michael Bell
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DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

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JEROME MICHAEL BELL,

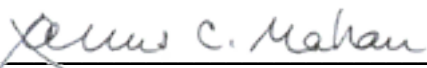
Defendant.

Case No. 2:15-cr-00011-JCM-CWH

Order

Based upon the stipulation of counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant's supplementation in support of compassionate release shall be due on or before July 4, 2024, the Government's response will be due 14 days from the date the supplement is filed, and Defendant's counsel will have seven days following submission of the response to file a reply.

DATED: May 28, 2024



THE HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE